

SLR:KMA; 2018V00809

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-X

TY CLEVENGER,

Plaintiff,

-against -

U.S. DEPARTMENT OF JUSTICE,
FEDERAL BUREAU OF INVESTIGATION,
and NATIONAL SECURITY AGENCY,

NOTICE OF MOTION

Civil Action No. 18-CV-01568

(Bloom, M.J.)

Defendants.

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PLEASE TAKE NOTICE that upon the pleadings, Defendants' Statement Pursuant to Local Civil Rule 56.1, Defendants' Notice to Pro Se Litigant Who Opposes a Motion for Summary Judgment, the Declaration of Gail Brodfeuhrer dated May 6, 2019 and the exhibits annexed thereto, the Declaration of Kevin G. Tiernan dated June 7, 2019 and the exhibits annexed thereto, the Declaration of David M. Hardy dated October 3, 2018 and the exhibits annexed thereto, the Second Declaration of David M. Hardy dated July 29, 2019 and the exhibits annexed thereto, the Declaration of Steven E. Thompson dated June 14, 2019 and the exhibits annexed thereto, the Memorandum of Law in Support of Defendants' Motion for Summary Judgment, and Defendants' Statement of Compliance with Local Civil Rule Defendants U.S. DEPARTMENT OF JUSTICE, FEDERAL BUREAU OF INVESTIGATION, and NATIONAL SECURITY AGENCY, will move before the Honorable Lois Bloom, United States Magistrate Judge of the Eastern District of New York, at the United States Courthouse, 225 Cadman Plaza, Brooklyn, New York, upon submission, unless a date

and at a time for oral argument are set by the Court, for judgment on the pleadings pursuant to Fed. R. Civ. P. 56 dismissing this action and for such other and further relief as the Court deems just and proper.

Dated: Brooklyn, New York
July 29, 2019

Respectfully submitted,
RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
Eastern District of New York
Attorney for Defendants
271-A Cadman Plaza East, 7th Floor
Brooklyn, New York 11201

By: s/Kathleen A. Mahoney
KATHLEEN A. MAHONEY
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TO: Ty Clevenger
Plaintiff Pro Se
P.O. Box 20753
Brooklyn, New York 11202-0752

DECLARATION OF SERVICE

Kathleen A. Mahoney hereby declares and states as follows:

That on the 29th day of July, 2019, I served these documents by First Class Mail

Notice of Motion

Defendants' Statement Pursuant to
Local Civil Rule 56.1

Defendants' Notice to Pro Se Litigant
Who Opposes a Motion for Summary Judgment

Declaration of Gail Brodfeuhrer

Declaration of Kevin G. Tiernan

Declaration of David M. Hardy

Second Declaration of David M. Hardy

Declaration of Steven E. Thompson

Memorandum of Law in Support of
Defendants' Motion for Summary Judgment

Defendants' Statement of Compliance
with Local Civil Rule 7.2

on

Ty Clevenger
Plaintiff Pro Se
P.O. Box 20753
Brooklyn, New York 11202-0752

Dated: Brooklyn, New York
July 29, 2019

s/*Kathleen A. Mahoney*
Kathleen A. Mahoney